

SEP 20 2007

2003P00148WOUS
Gerhard Jonke et al.**REMARKS*****Claim Status***

After entry of this Amendment, Claims 1 - 18 are pending. By this Amendment, Applicants amend Claim 1, and cancel Claims 19 and 20. No new matter is added.

Claim Rejections - 35 U.S.C. § 103

The Examiner rejects Claims 1 - 3, 6 - 8 and 14 - 20 under 35 U.S.C. § 103(a) as being unpatentable over Yoriki (U.S. Pat. No. 6,640,431) in view of Trzeciecki (U.S. Publication No. 2003/0059194). More particularly, the Examiner asserts that Yoriki discloses the limitations of Claim 1 except for each receiving tool being configured to be moved and controlled individually, wherein components can be mounted independently of external actuators. The Examiner cites Trzeciecki as disclosing a multi axis component actuator, wherein each receiving tool is configured to be moved and controlled individually, and wherein components can be mounted independently of external actuators. The Examiner concludes that it would have been obvious to combine the component mounting apparatus of Yoriki with the component actuator of Trzeciecki because it would provide active alignment of components. Applicants respectfully traverse.

In response to Applicants' argument the Examiner concedes that in Yoriki only the receiving tool at a certain rotational position is coupled to a drive, but argues that it is still coupled to a drive. The Examiner notes that the claim does not require that the receiving tool is permanently coupled. In view of the Examiner's note, Claim 1 is amended to include the limitations of Claim 20 (now cancelled) to Claim 1 and, hence, to specify that each receiving tool is permanently coupled to one of the active drives.

Applicants respectfully request the Examiner to enter the present Amendment. The Amendment does not raise new issues and does not require a further search because the added limitations are limitations of previously submitted Claim 20 (now cancelled), and are discussed in the present Office Action.

As previously discussed, Yoriki teaches that only the receiving tool at a certain rotational position is coupled to a drive, whereas a receiving tool that is not at such a rotational position is not coupled to a drive. Thus, Yoriki does not teach that

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each receiving tool is permanently coupled to one of a plurality of active drives. It is Applicants' understanding that the Examiner agrees with Applicants in this regard. Amended Claim 1, therefore, further distinguishes over Yoriki.

As to the limitation of "permanently coupled" recited in Claim 20 (now cancelled), the Examiner asserts that Trzeciecki discloses that each receiving tool is permanently coupled, and that it would have been obvious to combine Yoriki with Trzeciecki. Applicants respectfully disagree.

Trzeciecki discloses in Fig. 6 an arrangement of three positioning devices for aligning components to each other. (E.g., [0028]) Each positioning device is individually controllable and includes an ECM 29 (electromagnetic controllable dual axis mechanism), a component holder 31, and an actuator 22, which are coupled to a stator 20. ([0040]) Hence, Trzeciecki teaches that individual positioning devices (i.e., several stand-alone devices) can be grouped together and used to align components to each other. In Fig. 6, three components are aligned to each other, each held by one of the three positioning devices.

In view of the foregoing, the issue is whether amended Claim 1 is obvious over Yoriki in view of Trzeciecki. Applicants respectfully submit that it is not. Absent impermissible hindsight, Applicants submit that one of ordinary skill in the art would not combine Yoriki and Trzeciecki. Yoriki deals with the successive handling of a single component by a single receiving tool at a certain rotational position. In contrast, Trzeciecki deals, at least with respect to Fig. 6, with the simultaneous handling of three components to align them to each other, without any rotation of the component holders 31 or actuators 22. Active alignment and affixing aligned components one to another, as the Examiner asserts on page 5, last full sentence, appear to be not a problem Yoriki is concerned with. Therefore, one of ordinary skill in the art would not combine Yoriki and Trzeciecki.

Furthermore, Applicants submit that one of ordinary skill in art would perceive Yoriki's device as a reasonable implementation because only the receiving tool at a certain rotational position is coupled to a drive. As inactive receiving tools are not coupled to a drive a less complex implementation results, for example, because only one drive is needed. Nevertheless, the Examiner seems to suggest that one of ordinary skill in the art would deviate from Yoriki's device and modify it by coupling each receiving tool to a drive. Applicants, however, believe that one of

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ordinary skill in the art would not turn to a more complex implementation. In fact, it appears modifying Yoriki's device would require substantial changes to the principal structure and operation of Yoriki's device.

In view of the foregoing, Applicants respectfully submit that a combination of Yoriki and Trzeciecki does not disclose or suggest a multiple insertion head, as defined in amended Claim 1. Therefore, Applicants submit that amended Claim 1 is not obvious over Yoriki in view of Trzeciecki. Applicants respectfully request the Examiner to reconsider the rejections under 35 U.S.C. § 103(a) and to pass amended Claim 1 to allowance.

Claims 2 - 18 depend from Claim 1. For this reason and because of the additional inventive features recited in the dependent claims, Applicants respectfully submit that Claims 2 - 18 are patentable over Yoriki in view of Trzeciecki. Applicants respectfully request the Examiner to pass Claims 2 - 18 to allowance.

Under 35 U.S.C. § 103(a), the Examiner further rejects dependent Claims 4 - 5 as being unpatentable over Yoriki and Trzeciecki and further in view of Gieskes (U.S. Publ. No. 2004/0074085 A1), and Claims 9 - 13 as being unpatentable over Yoriki and Trzeciecki and further in view of Asai (U.S. Patent No. 5,588,195). Applicants respectfully traverse.

Claims 4 - 5 and 9 - 13 depend from Claim 1. The above arguments are repeated herein. Gieskes or Asai do not provide the missing teachings in Yoriki and Trzeciecki to anticipate nor render obvious amended Claim 1. Accordingly, at least for the above reasons, Claims 4 - 5 and 9 - 13 are also allowable and reconsideration and withdrawal of the rejections are respectfully requested.

Summary of the Response

Applicants have responded to the rejections in the July 26, 2007 Office Action by amending the claims, as set forth in the above listing of claims, and presenting the above arguments. Applicants respectfully submit that Claims 1 - 18 are in condition for allowance. Applicants respectfully request entry of this Amendment After Final as it does not raise new issues, and does not require a new search. Applicants respectfully request the Examiner to withdraw all rejections, and to pass this application to the issue process.

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Request for Telephone Interview

The undersigned has made a good faith effort to respond to the rejections raised in the Office Action so as to place the claims in condition for immediate allowance. Nevertheless, if any undeveloped issues remain or if any issues require clarification, the Examiner is respectfully requested to call the undersigned attorney of record at the telephone number listed below in order to resolve such issues promptly.

Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 502464 referencing attorney docket number 2003P00148WOUS. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

Respectfully submitted,

Date: 9/20/07

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